STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

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Illinois Commerce Commission, on its own Motion,

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No: 01-0706

North Shore Gas Company,

:

Reconciliation of revenues collected under: Gas adjustment charges with actual costs: Prudently incurred.

STAFF WITNESSES' MOTION TO RESET THE SCHEDULE

Now come the Staff Witnesses of the Illinois Commerce Commission by their attorneys, Sean R. Brady and James E. Weging, and hereby move to reset the schedule in the above cause to whatever schedule is determined for the companion case of Peoples Gas Light & Coke Co., Ill.C.C. Docket No. 01-0707. In furtherance of this Motion, the following is stated:

- The above cause and the cause in III.C.C. Docket No. 01-0707 are companion cases seeking the reconciliation of PGA charges for the year 2001. Parallel schedules have been set throughout the pendency of both dockets.
- 2. Staff Witnesses and other parties have recently filed a Joint Motion to Amend the Schedule in III.C.C. Docket No. 01-0707. Regardless of what the actual schedule in III.C.C. Docket No. 01-0707 will become, Staff Witnesses urge that the schedule in III.C.C. Docket No. 01-0706 be kept parallel with the schedule in III.C.C. Docket No. 01-0707.

- 3. Although the discovery disputes and controversial transactions directly affect III.C.C. Docket No. 01-0707, because of how these affiliated companies are run, some adjustments to the PGA revenues and expenses of Peoples Gas Light & Coke Co. have parallel adjustments to the PGA revenues and expenses of North Shore Gas Co.
- 4. Adjustments that the Staff Witnesses will recommend in III.C.C. Docket No. 01-0706 are essentially equivalent to those that will be offered in III.C.C. Docket No. 01-0707, since the issues in 01-0706 are encompassed by the issues in 01-0707.

WHEREFORE, for all the reasons stated, the Commission Staff Witnesses respectfully request that the Administrative Law Judge grant their Motion and reset the schedule in the above docket to parallel the schedule in III.C.C. Docket No. 01-0707.

Dated: August 24, 2004

Respectfully submitted,

/s/

SEAN R. BRADY
JAMES E. WEGING
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